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Filed Electronically

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: WT Docket No. 01-108
RM-11355**

EX PARTE NOTICE

Dear Ms. Dortch:

This letter is to memorialize for the record in the above referenced dockets meetings on May 10, 2007 between John Koch and Steve Shapiro of ADT Security Services, Inc., Gordon Hope of Honeywell, and John Prendergast of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP (on behalf of the Alarm Industry Communications Committee), and the following Commission personnel: Commissioner Deborah Taylor-Tate and Aaron Goldberger; Commissioner Copps and Bruce Gottlieb; and Fred Campbell, Cathy Massey, Roger Noel, Richard Arsenault and Joyce Jones of the Wireless Telecommunications Bureau. During these meetings, the attendees discussed the matters reflected in the *ex parte* presentation which was filed by AICC in the above proceedings on April 27, 2007. AICC also indicated that the alarm industry may be able to reduce the time necessary to extend the analog requirement, particularly if it can gain the participation of cellular carriers in a plan to implement the analog shut down in geographic phases.

AICC also discussed with the Bureau personnel information requested by the Bureau concerning the ADT AWARE program described in AICC's Petition for Rule Making in this proceeding.

In particular, ADT advised the Commission's staff that there are currently approximately 1000 AMPS units in use in connection with the AWARE program. ADT has worked with Honeywell to develop a replacement procedure for the existing AWARE radios. Because domestic violence victims often must move frequently, the AWARE AMPS radios are housed in a special case that allows for a certain degree of portability (although requiring a technician hook up with each move), as well as an inconspicuous appearance. Because the replacement digital radios are larger than the original AMPS units, they do not fit into the carrying case along with the other circuitry. Therefore, Honeywell has designed modifications that accommodate the new radio, and ADT is in the process of scheduling replacement visits. Photographs of the AWARE AMPS radio and the digital replacement configuration are attached. Unfortunately, every AWARE installation requires that the technician visit with a uniformed police officer, under the policy formulated with the law enforcement entities involved in the program. This will hamper the speed of the replacement process, but obviously ADT will be doing everything possible to complete the AWARE replacement visits prior to the shutdown of AMPS service.

However, this effort cannot account for all of the abuse victims that subscribe to AMPS alarm service outside of the AWARE program, as explained in the Petition for Rule Making in RM-11355 (at pp. 20-21). The relevant portion of the Petition states as follows:

As important as the AWARE program has become to the protection of battered women, there is an even larger class of domestic violence victims protected by AMPS alarm devices that cannot be readily identified. In particular, many abuse victims simply subscribe to an alarm service to protect them from their abuser. The alarm industry has no way of knowing which AMPS radios to replace first, in order to single out and protect victims in this situation.

Unfortunately, domestic violence is a widespread problem. It is estimated that 1 in 4 women will experience domestic violence in their lifetime.¹ Intimate partner violence results in nearly two million injuries and 1,300 deaths nationwide *every year*.² Unfortunately, a high rate of domestic abuse goes unreported. From 1992 to 2000, only 54 percent of the violent crime committed by intimates was reported to the police.³ A significant number of the millions of abuse victims in the country subscribe to alarm services, including the panic button capability, to keep them safe from their abuser. Since AMPS radios provide the radio link for a large number of these victims, an interruption in AMPS service would place these persons in danger. And because the alarm industry has no way of identifying domestic violence victims who are not part of a specific program like AWARE, the industry must replace all existing AMPS radios in order to ensure that all abuse victims remain protected. As described above, it does not appear that this gargantuan task can be accomplished by the current AMPS sunset date.

¹ National Center for Victims of Crime, www.ncvc.org.

² Centers for Disease Control and Prevention 2003 (<http://www.cdc.gov/ncipc/factsheets/ipvfacts.htm>).

³ Source: Reporting Crime to the Police, 1992 -2000, Bureau of Justice Statistics, U.S. Department of Justice, October 2001. See http://www.snbw.org/articles/unreported_violence.htm.

Therefore, simply replacing the AWARE radios will not eliminate the risk posed to domestic abuse victims by the shutdown of AMPS service.

AICC also notes the submission of an April 30, 2007 *ex parte* letter by CTIA and certain wireless carriers, arguing that maintaining an analog network would place an undue burden on rural and small carriers. As noted in its February 6, 2007 Reply Comments and April 27, 2007 *ex parte* presentation, AICC is sensitive to these concerns, and has proposed an exemption for both rural and small cellular systems from any analog extension that may be adopted in this proceeding. AICC notes that this exemption would apply to many rural and small market cellular systems operated by large carriers as well. None of the carriers participating in the April 30, 2007 letter have indicated that they would not qualify for the proposed exemption. AICC and the alarm industry stand ready to work with the Commission and small and rural carriers to ensure that they are not adversely affected by the proposed extension, by tweaking the proposed exemption and/or supporting appropriate waiver requests.

Please direct any questions concerning the above matter to the undersigned at (202) 828-5540.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Prendergast", with a stylized flourish at the end.

John A. Prendergast

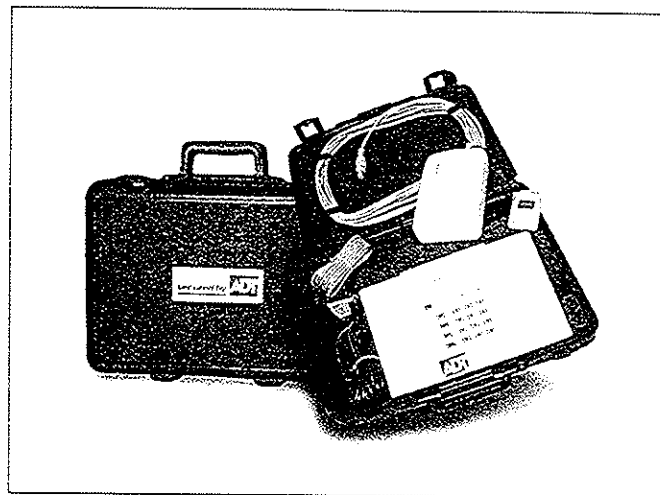
JAP/mlb

cc: Commissioner Michael Copps
Commissioner Deborah Taylor-Tate
Aaron Goldberger
Bruce Gottlieb
Fred Campbell
Cathy Massey
Roger Noel
Richard Arsenault
Joyce Jones

Getting Equipped

Here's everything you need to order and install the AWARE® System Kit.

A new self-contained AWARE installation kit, including RADIO BACK-UP has been developed for cities that have active ADT AWARE Programs and is now available in the Memphis CDC. This product was specifically designed for new installations and should not be used as a replacement for any existing AWARE systems currently installed.



To order a kit, call Memphis, reference the stock code number, and bill it to Master Job #65.

IMPORTANT NOTE: There are only a limited number of AWARE kits in stock, so please only order what is necessary to complete the installations within your market.

ADT AWARE® SYSTEM KIT

Materials and Labor

Stock code number: 472531EA

Labor and installation:

1. Run wire and install RJ31X
2. Program set (Lynx self-contained unit)
3. Program Cellguard

472531A

ADT PREBOXED PACK



The 472531A is a preboxed pack for the ADT program. Designed to support efforts to notify the authorities in the event of a violation of a person's rights, the pack contains the LYNX self contained control, a 7845GSM digital backup radio, a 5802MN wireless pendant transmitter, telephone cord and briefcase.

The pack's black briefcase in which all the equipment is mounted, allows for easy demonstration of the unit, and also serves to discretely contain the system when in use.

FEATURES

Contents (BOM)

- LYNX Self contained control panel
- 7845GSM GSM radio
- 5802MN wireless pendant transmitter
- Telephone cord
- Black briefcase in which all equipment is mounted

SPECIFICATIONS

Country of Origin

- Mexico

Weight

- 14 Lbs

ORDERING

472531A



Honeywell Security & Custom Electronics
Honeywell
2 Corporate Drive
Melville, NY 11747
www.honeywell.com

L/472531AD/D
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